

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| | X | |
| JERRY TWINDE, On Behalf of Himself and | : | Civil Action No. 1:07-cv-06227-JSR |
| All Others Similarly Situated, | : | (Consolidated) |
| | : | |
| Plaintiff, | : | <u>CLASS ACTION</u> |
| | : | |
| vs. | : | NOTICE OF MOTION FOR |
| | : | APPOINTMENT AS LEAD PLAINTIFF |
| THRESHOLD PHARMACEUTICALS, INC., | : | AND FOR APPROVAL OF SELECTION OF |
| et al., | : | LEAD COUNSEL |
| | : | |
| Defendants. | : | |
| | : | |
| | X | |

PLEASE TAKE NOTICE that class member Michael Hentosh, by his counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) appointing Michael Hentosh as Lead Plaintiff; (ii) approving Michael Hentosh's selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Michael Hentosh submits herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated September 4, 2007.

DATED: September 4, 2007

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

/s/ Mario Alba Jr.
MARIO ALBA, JR.

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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on September 4, 2007, I caused a true and correct copy of the attached:

Notice Of Motion For Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Michael Hentosh For Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel; and

Declaration of Mario Alba Jr. In Support Of The Motion Of Michael Hentosh For Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel.

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

THRESHOLD

Service List - 8/31/2007 (07-0144)

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